NOTICE OF AMENDMENT

March 14, 2001

CERTIFIED - RETURN RECEIPT REQUESTED

Mr. Edward M. Nolan
Senior Vice President - Utilities Operations
Equitrans, L.P.
200 Allegheny Center Mall
Pittsburgh, PA 15212-5331

CPF No. 1-2001-1003M

Dear Mr. Nolan:

On May 22-26, 2000, a representative of the Eastern Region, Office of Pipeline Safety (OPS) and a representative of the West Virginia Pubic Service Commission, pursuant to Chapter 601 of the United States Code, conducted an onsite pipeline safety inspection of Equitrans at your headquarters office in Pittsburgh, Pennsylvania.

As a result of a review of your operations and maintenance manual (O&M), the following procedures were found to be inadequate.

1. § 192.225 - Welding - General

(a) Welding must be performed by a qualified welder in accordance with welding procedures qualified to produce welds meeting the requirements of this subpart. The quality of the test welds used to qualify the procedure shall be determined by destructive testing.

a) **§ 192.231** - The welding procedures should be revised to state that the

welding operation must be protected from weather conditions that could impair the quality of the completed weld.

b) **§ 192.241(b) -** The nondestructive inspection procedures (Standard 4.05, Section 3.1) states that "each butt weld on pipelines to be operated at a hoop stress of 20% or more of the specified minimum yield strength shall be 100% nondestructively tested . . ." The reference to "butt" weld should be removed from the procedure to be in compliance with § 192.241(b) of the code. The code states that "The welds on a pipeline . . . must be nondestructively tested".

c) **§ 192.245(b), (c)** - Your O&M plan (Standard 4.01, Section 2.5.2.2) does not contain procedures for the repair and removal of weld defects as outlined in the code.

2. § 192.605 - Procedural manual for operations, maintenance, and emergencies.

(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

This O&M manual must address the applicable sections outlined under § 192.605 and also sections described under Subparts L, M and I of the pipeline safety code. During the review of your procedures the following deficiencies were noted:

a) **§ 191.5 -** The Telephonic Notice Worksheet (Standard 10.13, Page 5 of 43) needs to be revised to include the name of the operator and the name of the person making the report. Due to the different operating areas and companies under Equitable Resources, the possibility exists for a report to be filed incorrectly.

b) **§ 191.15(b) -** Your procedures for filing incident reports (Standard 10.13, Section 5.0) does not address the requirement for filing supplemental reports when additional related information is obtained after the initial incident report has been submitted to the OPS.

c) **§ 192.453** - Your O&M plan does not contain written procedures for the design, installation, and operation and maintenance of cathodic protection systems. If industry standards are to be used, they must be referenced in the procedures.

d) **§ 192.467** - The procedure for electrical isolation and insulating joints does not outline the methods to be used to prevent arcing in areas where a combustible atmosphere is present.

e) **§ 192.467(f)** - The procedure for addressing fault currents on a pipeline (Standard 8.02, Section 7.5.1.5) does not identify the methods to be used in pinpointing and mitigating fault currents. If a particular industry standard is used, it should be referenced in the procedures.

f) **§ 192.473(b)** - The procedures addressing stray current corrosion mitigation (Standard 8.02, Section 9.0) should require that cathodic protection systems be designed to minimize stray currents on nearby structures.

g) **§ 192.475(a)** - The procedures for internal corrosion control should identify specific components of the gas and/or liquids that contribute to internal corrosion. The procedure should also include the concentration levels at which each component is considered to be corrosive. The procedure should also address coupon monitoring if applicable. The procedures for coupon monitoring should include the test intervals, and guidelines for evaluating metal loss on the coupons.

h) **§ 192.485(c)** - the procedure for corrosion remediation (Standard 8.02, Section 4.3) does not address the methods used for determining the remaining wall thickness as outlined in § 192.485(c) of the code.

i) **§ 192.555(c), (d), (e)** - Your procedures for uprating a pipeline to a pressure that will produce a hoop stress of 30% or more of SMYS should be amended to ensure that all the requirements of the code have been addressed in the procedures.

j) **§ 192.605(b)(9)** - Your procedures pertaining to safety in trenches should be amended to remove reference to pits greater than 4' in depth. Appropriate safety precautions should be taken to protect personnel from the accumulations of vapor or gas when employees are working in excavated trenches regardless of the depth of the trench.

k) **§ 192.605(b)(8)** - Your O&M manual does not contain procedures for periodically reviewing the work done by operating personnel to determine the effectiveness, and adequacy of the procedures used during normal operating and maintenance work and modifying the procedures when deficiencies are found.

l) **§ 192.613(a)** - Your procedures for continuing surveillance (Standard 10.01, Section 6.1) should be amended to include changes in class locations.

m) **§ 192.616** - Your public education procedures (Emergency Plan Standard 10.12, Section 12.0) do not address the intervals at which the media will be distributed to the general public. In addition, the procedures do not address the intervals at which educational programs are provided to appropriate emergency response organizations (fire, police, etc.) and those engaged in excavation activities to recognize and report gas-type emergencies.

n) **§ 192.617** - Your procedures for the Investigation of Failures (Standard 10.01 Page 7 of 43) are inadequate in that they do not contain detailed procedures for analyzing accidents and failures. For example, procedures should address guidance to personnel responding to the incident, the collection and documentation of incident data including photographs, handling, and preservation of the specimen, conducting interviews, coordination on-site between company and emergency response personnel.

o) **§ 192.625(f)** - Your procedures for the odorization of gas do not address the intervals at which the sampling will be conducted and the instruments that will be used during the tests. In addition, your procedures state that the L.E.L (lower explosive limit) for natural gas is between 4% and 5%. The code requires that gas concentrations be detectable at 1/5th L.E.L. In order for field personnel to obtain accurate readings, the procedure needs to be consistent in the percentage L.E.L that they are using throughout the system. Thus, your procedures should state the lower explosive limit that should be used in calculations throughout the system (4% would be most conservative).

p) **§ 192.703(b)** - Your plan does not state that each segment of pipeline that becomes unsafe must be replaced, repaired, or removed from service.

q) **§ 192.705(a)** - Your procedures for Patrolling (Standard 10.10, Section 3.0) do not state surface conditions that will be monitored during the patrols. The referenced code section requires that the patrolling program shall be conducted to observe surface conditions on and adjacent to the right-of-way for indications of leaks, construction activity, and other factors affecting safety and operation (ie. erosion, wash-outs, exposed pipe, slide areas . . . etc.). The procedures should also include instructions for conducting follow-up inspections when situations are identified during the patrols that require additional monitoring.

r) **§ 192.735(b)** - Your procedures (Standard 10.19, Section 10.3) do not state that aboveground oil or gasoline storage tanks must be protected in accordance with the National Fire Protection Association (NFPA) Standard No. 30.

s) **§ 192.736(b), (c)** - Your procedures pertaining to gas detection systems (Standard 10.19, Section 9.3) do not specify the monitoring set points for the gas detection and alarm system (25% LEL). In addition, the procedures must require that performance tests be performed as part of the maintenance of the system.

t) **§ 192.743** - The procedures for overpressure protection (Standard 10.19, Section 6.0) does not address the methods used in determining and/or calculating the capacity of the reliefs.

u) **§ 192.745** - Your emergency valve maintenance program procedures (Standard 10.21, Section 5.0) should be revised to include annual maintenance of blow-off valves. Standard 10.21, Section 3.2, states that blow-off valves are non-emergency valves. Blow-off valves are used to reduce the pressure in an isolated pipeline segment during an emergency. These valves should be included as part of the emergency valve maintenance program.

3. § 192.615(a) - Emergency plans.

Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency.

The emergency procedures must address all requirements outlined in § 192.615.

a) **§ 192.615(a)(1)** - Your Emergency Plan procedures for receiving, identifying and classifying notices of events that require immediate response (Standard

10.12, Section 5.0) does not address gas leaks.

b) **§ 192.615(a)(3)** - Your Emergency Plan does not contain procedures for prompt and effective response to each type of emergency including: 1) Gas detected inside a building; 2) Fire located near or directly involving a pipeline facility; 3) Explosion occurring near or directly involving a pipeline facility; 4) Natural disasters.

c) **§ 192.615(a)(4)** - Your procedures outlining emergency materials and supplies (Standard 10.12, Section 7.0) should focus on specialized equipment and supplies that may be needed at the scene of an emergency and the availability and location of such equipment and supplies. Additional sources such as contractors, rental facilities, or other gas pipeline operators may be required. Some examples of specialized equipment may include backhoes, trackhoes, dozers, jackhammers, compressors, trailers for hauling heavy equipment, dump trucks, etc. Your procedures should also provide guidance on the availability and location of emergency supplies such as emergency pipe, valves, repair sleeves, specialized fittings, etc.

d) **§ 192.615(a)(6)** - Your Emergency Plan does not contain or reference procedures for performing emergency shutdown and pressure reduction on any section of your pipeline system. Procedures must be added to your plan to address this code requirement.

e) **§ 192.615(a)(10)** - Your procedures for the investigation of failures do not specify that the investigation that is required in § 192.617 shall begin as soon as possible after the emergency.

f) **§ 192.615(b)(1)** - Your procedures for training and review (Standard 10.12, Section 10.0) do not address the requirement for providing supervisors, who are responsible for emergency action, a copy of that portion of the latest edition of the emergency plan.

g) **§ 192.615(b)(2)** - Your procedures for training and review (Standard 10.12, Section 10.0) do not address how Equitrans verifies the effectiveness of the emergency plan training that is provided to the operating personnel.

h) **§ 192.615(b)(3)** - The Emergency Plan procedures do not address reviewing employee activities following an emergency to determine whether the procedures were effectively followed.

i) **§ 192.615(c)** - The procedures for liaison with public officials (Standard 10.12, Section 8.0) do not address the frequencies at which the liaison meeting will be conducted or the materials that will be distributed during the meetings (i.e., maps, emergency phone list, facility maps, site-specific information location of

flammable materials, facility access information, etc.), firefighting capabilities/equipment . . . etc.

j) Clock spring waivers are no longer required by DOT. The following sections of your plan should be amended to reflect this change:

Standard 10.01, Section 20.1.3, Page 13 of 43
Standard 10.01, Section 22.14, Page 15 of 43
Standard 8.02, Section 4.3.2.2.2, Page 4 of 24

As provided in 49 C.F.R. 190.237, this Notice of Amendment serves as your notification that this office considers your procedures/plans inadequate. Under 49 C.F.R. 190.237, you have a right to submit written comments or request an informal hearing. You must submit written comments or a request for a hearing within 30 days after receipt of this Notice. If you do not wish to contest this Notice of Amendment, you may provide your revised procedures within 90 days of receipt of this notice. After reviewing the record, the Associate Administrator for Pipeline Safety will determine whether your plans or procedures are adequate. The criteria used in making this determination are outlined in 49 C.F.R. 190.237.

Please reference **CPF No. 1-2001-1003M** in all correspondence/communication regarding this matter.

Sincerely,

William H. Gute
Director, Eastern Region
Office of Pipeline Safety

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FILE: CPF-1-2001-1003M/NOA-Equitrans
e:\wpwin\sj\amendments\CPF-1-2001-1003M.my.wpd
cc: DPS-22.1, DPS-24, NJDO, MEDO, PIDO, Regions
Fax copy to Darrell McKown/WV PSC